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December 17, 2015

Honorable Joseph F. Bianco
100 Federal Plaza
Courtroom 920
Central Islip, New York 11722

Re: Isac Munoz, et al. v. Sestwon Pizza d/b/a Domino's Pizza and Robert Cookston
Docket No. 7:15-CV-04633 (NSR)

Dear Judge Bianco:

This office is legal counsel to the Defendants in connection with the above-referenced matter. The instant complaint was served on December 9, 2015, and as such, the Defendants have until December 29, 2015 to respond to the Complaint either by answer or by motion.

We are writing to respectfully request an extension of time up to and including February 1, 2016 to respond to the complaint. The reason for this request is the fact that the Complaint was served in the midst of the holidays and other work related conflicts, the Defendants and the undersigned need sufficient time to investigate the allegations in the complaint which was brought on behalf of six former employees. While Plaintiff has agreed only to an extension to January 11, 2016, given Defendants' and the undersigned's schedule a lengthier extension will be necessary.

Thank you for your time and consideration.

Very truly yours,



Robin B. Kallor

RBK/ktb

cc: Attorney Roman Avshalumov, Helen F. Dalton & Associates, P.C.